

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN  
DISTRICT OF ILLINOIS, EASTERN DIVISION**

|   |   |                                     |
|---|---|-------------------------------------|
| ABC INTERNATIONAL, INC., an Ohio corporation,   | ) |                                     |
|   | ) |                                     |
|   | ) |                                     |
| Plaintiff,  | ) |                                     |
| v.  | ) | Case No. 1:20-cv-01579              |
|   | ) |                                     |
| GD GROUP USA COMPANY, doing business as GD MEDICAL INC., an Illinois corporation, and YONG ZHANG, individually, | ) | Honorable Judge Robert M. Dow, Jr.  |
|   | ) | Magistrate Judge Gabriel A. Fuentes |
|   | ) |                                     |
| Defendants.   | ) | JURY DEMANDED                       |
|   | ) |                                     |
| <hr style="width: 40%; margin-left: 0;"/>   |   |                                     |
| YONG ZHANG,   | ) |                                     |
|   | ) |                                     |
| Counter-Plaintiff,  | ) |                                     |
| v.  | ) |                                     |
|   | ) |                                     |
| ABC INTERNATIONAL, INC. an Ohio corporation, and EDDIE NI, individually,  | ) |                                     |
|   | ) |                                     |
| Counter-Defendants.   | ) |                                     |

**DEFENDANT YONG ZHANG’S MOTION TO JOIN DEFENDANT GD  
GROUP USA COMPANY’S MOTION UNDER FRCP 20(a)(2) FOR  
LEAVE TO ADD EDDIE NI AS A COUNTER-DEFENDANT**

Defendant Yong Zhang (“Zhang”), by and through its attorneys, Burke, Warren, MacKay & Serritella, P.C., moves this honorable Court to permit him to join in Defendant GD Group USA Company, d/b/a GD Medical’s (“GD Medical”), Motion Under FRCP 20(a)(2) for Leave to Add Eddie Ni (“Ni”) as a Counter-Defendant [ECF No. 46.], and in support thereof states as follows:

1. On January 22, 2021, Plaintiff, ABC International, Inc. (“ABC”), filed an Amended Complaint in this matter, which alleged causes of action for breach of contract (Count I) and Conversion (Count II) against GD Medical; and asserted causes of action against Defendant

Yong Zhang (“Zhang”), in the alternative, for breach of contract (Count III); Conversion (Count IV); and Fraud (Count V). [ECF No. 30.].

2. On November 1, 2021, pursuant to the Court’s October 18, 2021 Order [ECF No. 43.], GD Medical and Zhang timely filed their Answers, Affirmative Matter, and Counterclaims. [ECF No. 44 and ECF No. 45.].

3. Thereafter, on November 1, 2021, Defendant GD Medical filed a motion requesting leave from this Honorable Court to add ABC’s President, Eddie Ni, as a Counter-Defendant to this matter. (“GD Medical’s Motion”). [ECF No. 46.].

4. The arguments raised in Defendant GD Medical’s Motion apply equally to Zhang, as Zhang also wishes to add Ni as a Counter-Defendant for claims based upon his conduct alleged in, and the subject of, ABC’s Amended Complaint. [*See generally* ECF Nos. 30, 44, 45, and 46.]. Accordingly, Defendant Zhang seeks to adopt such arguments raised by GD Medical and to join in Defendant GD Medical’s Motion [ECF No. 46].

WHEREFORE, Defendant, Yong Zhang, respectfully requests that this honorable Court (i) permit him to join in Defendant GD Medical’s Motion Under FRCP 20(a)(2) for Leave to Add Eddie Ni as a Counter-Defendant; and for the reasons asserted in GD Medical’s Motion, (ii) join Eddie Ni as a Counter-Defendant under the Counterclaims pled in ECF No. 44 and 45; and (iii) for such other and further relief as this Court deems just and proper.

Dated: November 1, 2021

Respectfully submitted,  
YONG ZHANG, *Defendant*.

By: /s/ Christopher E. Kentra  
One of His Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing *Defendant Yong Zhang's Motion to Join Defendant GD Group USA Company's Motion Under FRCP 20(a)(2) for Leave to Add Eddie Ni as a Counter-Defendant* to be served on all parties of record via the CM/ECF E-Filing System, in accordance with the rules of electronic filing of documents, on this 1st day of November, 2021.

/s/ Morgan M. Hess